

1 **BOIES SCHILLER FLEXNER LLP**
 2 David Boies (admitted pro hac vice)
 3 333 Main Street
 4 Armonk, NY 10504
 5 Tel.: (914) 749-8200
 6 dboies@bsfllp.com
 7 Mark C. Mao, CA Bar No. 236165
 8 Beko Reblitz-Richardson, CA Bar No. 238027
 9 44 Montgomery St., 41st Floor
 10 San Francisco, CA 94104
 11 Tel.: (415) 293-6800
 12 mmao@bsfllp.com
 13 brichardson@bsfllp.com
 14 James Lee (admitted pro hac vice)
 15 Rossana Baeza (admitted pro hac vice)
 16 100 SE 2nd St., 28th Floor
 17 Miami, FL 33131
 18 Tel.: (305) 539-8400
 19 jlee@bsfllp.com
 20 rbaeza@bsfllp.com
 21 Alison L. Anderson, CA Bar No. 275334
 22 M. Logan Wright, CA Bar No. 349004
 23 2029 Century Park East, Suite 1520
 24 Los Angeles, CA 90067
 25 Tel.: (213) 995-5720
 26 alanderson@bsfllp.com
 27 mwright@bsfllp.com

1 **SUSMAN GODFREY L.L.P.**
 2 Bill Carmody (admitted pro hac vice)
 3 Shawn J. Rabin (admitted pro hac vice)
 4 Steven M. Shepard (admitted pro hac vice)
 5 Alexander Frawley (admitted pro hac vice)
 6 Ryan Sila (admitted pro hac vice)
 7 One Manhattan West, 50th Floor
 8 New York, NY 10001
 9 Tel.: (212) 336-8330
 10 bcarmody@susmangodfrey.com
 11 srabin@susmangodfrey.com
 12 sshepard@susmangodfrey.com
 13 afrawley@susmangodfrey.com
 14 rsila@susmangodfrey.com

15 Amanda K. Bonn, CA Bar No. 270891
 16 1900 Avenue of the Stars, Suite 1400
 17 Los Angeles, CA 90067
 18 Tel.: (310) 789-3100
 19 abonn@susmangodfrey.com

MORGAN & MORGAN

20 John A. Yanchunis (admitted pro hac vice)
 21 Ryan J. McGee (admitted pro hac vice)
 22 Michael F. Ram, CA Bar No. 104805
 23 201 N. Franklin Street, 7th Floor
 24 Tampa, FL 33602
 25 Tel.: (813) 223-5505
 26 jyanchunis@forthepeople.com
 27 rmcegee@forthepeople.com
 28 mram@forthepeople.com

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

1 ANIBAL RODRIGUEZ, SAL
 2 CATALDO, JULIAN
 3 SANTIAGO, and SUSAN LYNN
 4 HARVEY, individually and on behalf of all
 5 others similarly situated,

6 Plaintiffs,
 7 vs.
 8 GOOGLE LLC,
 9 Defendant.

10 Case No.: 3:20-cv-04688-RS

**ADMINISTRATIVE MOTION TO
 CONSIDER WHETHER ANOTHER
 PARTY'S MATERIAL SHOULD BE
 SEALED**

11 The Honorable Richard Seeborg
 12 Courtroom 3 – 17th Floor
 13 Date: May 15, 2025
 14 Time: 1:30 p.m.

1 Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether
 2 Google LLC's ("Google") material should be sealed. The material is included within Plaintiffs'
 3 Opposition to Google's Motion to Exclude Plaintiffs' Expert Bruce Schneier (Dkt. 474).

4 Document Sought to Be Sealed	5 Party Claiming 6 Confidentiality	7 Basis for Sealing
8 Plaintiffs' Opposition to Google's 9 Motion to Exclude Plaintiffs' Expert 10 Bruce Schneier 11 Portions 12 GOOG-RDGZ-00168911 13 Entirety 14 Attached as Exhibit 4 to the Frawley 15 Declaration	16 Google	17 Refers to Material Designated 18 "Confidential" and "Highly 19 Confidential" by Google 20 pursuant to the Protective 21 Order
22 GOOG-RDGZ-00015824 23 Entirety 24 Attached as Exhibit 5 to the Frawley 25 Declaration	26 Google	27 Designated "Confidential" by 28 Google pursuant to the Protective Order
29 GOOG-RDGZ-00017622 30 Entirety 31 Attached as Exhibit 6 to the Frawley 32 Declaration	33 Google	34 Designated "Highly 35 Confidential – Attorneys' Eyes 36 Only" by Google pursuant to 37 the Protective Order

19 Pursuant to Civil Local Rule 79-5(f), Google, as the Designating Party, bears the
 20 responsibility to establish that its designated material is sealable.

21
 22 Dated: April 24, 2025

Respectfully submitted,

23 By: /s/ Mark Mao

24 Mark C. Mao (CA Bar No. 236165)
 25 mmao@bsflp.com
 26 Beko Reblitz-Richardson (CA Bar No. 238027)
 27 brichardson@bsflp.com
 28 BOIES SCHILLER FLEXNER LLP
 44 Montgomery Street, 41st Floor
 San Francisco, CA 94104
 Telephone: (415) 293 6858

1 Facsimile (415) 999 9695
2

3 David Boies (admitted *pro hac vice*)
4 dboies@bsflp.com
5 BOIES SCHILLER FLEXNER LLP
6 333 Main Street
7 Armonk, NY 10504
8 Telephone: (914) 749-8200
9

10 James Lee (admitted *pro hac vice*)
11 jlee@bsflp.com
12 Rossana Baeza (admitted *pro hac vice*)
13 rbaeza@bsflp.com
14 BOIES SCHILLER FLEXNER LLP
15 100 SE 2nd Street, Suite 2800
16 Miami, FL 33131
17 Telephone: (305) 539-8400
18 Facsimile: (305) 539-1307
19

20 Alison L. Anderson, CA Bar No. 275334
21 alanderson@bsflp.com
22 M. Logan Wright, CA Bar No. 349004
23 mwright@bsflp.com
24 BOIES SCHILLER FLEXNER LLP
25 2029 Century Park East, Suite 1520
26 Los Angeles, CA 90067
27 Telephone: (813) 482-4814
28

29 Bill Carmody (*pro hac vice*)
30 bcarmody@susmangodfrey.com
31 Shawn J. Rabin (*pro hac vice*)
32 srabin@susmangodfrey.com
33 Steven Shepard (*pro hac vice*)
34 sshepard@susmangodfrey.com
35 Alexander P. Frawley
36 afrawley@susmangodfrey.com
37 Ryan Sila
38 rsila@susmangodfrey.com
39 SUSMAN GODFREY L.L.P.
40 One Manhattan West, 50th Floor
41 New York, NY 10001
42 Telephone: (212) 336-8330
43

44 Amanda Bonn (CA Bar No. 270891)
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46 SUSMAN GODFREY L.L.P.
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48 Los Angeles, CA 90067
49 Telephone: (310) 789-3100
50

1 John A. Yanchunis (*pro hac vice*)
2 jyanchunis@forthepeople.com
3 Ryan J. McGee (*pro hac vice*)
4 rmcgee@forthepeople.com
5 Michael F. Ram (CA Bar No. 238027)
6 mram@forthepeople.com
7 MORGAN & MORGAN, P.A.
8 201 N Franklin Street, 7th Floor
9 Tampa, FL 33602
10 Telephone: (813) 223-5505
11 Facsimile: (813) 222-4736

12 *Attorneys for Plaintiffs*

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